

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

City of Chicago,

*Plaintiff,*

v.

DoorDash, Inc. and Caviar, LLC,

*Defendants.*

Civil Action No. 1:21-cv-05162

Hon. Jeremy C. Daniel  
Magistrate Judge Jeffrey T. Gilbert

**JOINT STATUS REPORT**

Pursuant to this Court's orders dated December 23, 2022 (ECF No. 90) and December 19, 2022 (ECF No. 87) directing the parties to file a status report seven days after each rolling production deadline to provide information about the last rolling production, what has been produced to date in total, and what remains to be produced, the parties hereby file this Joint Status Report concerning the March 15, 2024 production deadline.

**I. Status of the City's Document Productions**

**A. Documents Produced by the City To Date**

As of March 15, the City has produced 6,934 documents, totaling 54,789 pages, in rolling productions. The City's prior productions are described in more detail in the prior joint status reports (ECF Nos. 96, 101, 105, 109, 115, 151, 164, 174, 194, 200, 202, 216, 230, 234, 242, 246, 249, 250, 282, 294).

The City's March 8, 2024 production contained 8 documents and 77 pages. This production contained documents responsive to RFP No. 3 (documents referenced in the City's responses to DoorDash's First Set of Interrogatories).

**B. Remaining Documents to be Produced**

The City responded to Defendants' Eighth Set of Requests for Production (Nos. 107-115) on February 14. The parties are now in the process of meeting and conferring on these and other requests. On January 31, DoorDash requested that the City supplement its response to several document requests and proposed narrowed versions of several others to which the City had objected; the parties continue to negotiate those proposals, including those for RFP Nos. 25 and 34. In the parties' Joint Status Report filed on March 15, the City identified productions it could make in response to RFP Nos. 43, 88, 89, 91-93, 98. Defendants have first requested further information on the City's search methodology, which the City will provide. The City continues to review its overall production for completeness. The City produced a privilege log on March 1, reflecting privileged documents withheld or redacted in the course of the City's searches for responsive documents to date. The City will meet and confer with DoorDash regarding any perceived inadequacies in that log, and the City will supplement the log to reflect privileged documents identified in any future searches agreed to in the parties' discovery negotiations or directed by the Court. In the next two weeks, the City expects to make a small production of documents that initially had been withheld as privileged but that, on further review in connection with its privilege log, the City determined should be produced.

## **II. Status of DoorDash's Document Productions**

### **A. Documents Produced by DoorDash to Date**

DoorDash did not make a production on March 15, 2024. Since August 2022, DoorDash has produced a total of 7,073 documents and 36,237 pages across 24 productions. The documents produced to date include:

- Custodial documents responsive to the City's document requests relating to minimum amount promotional discounts, non-partner restaurants, Dasher pay, consumer fees, and menu pricing;
- Documents identified in known non-custodial locations;
- Documents identified from DoorDash's review of documents produced in related investigations and litigations;
- Spreadsheets that were created in order to respond to the City's requests for specific data.

As of the date of this report, DoorDash has produced documents responsive to the majority of the City's requests for production.

### **B. Remaining Documents to be Produced**

DoorDash recently agreed to produce documents from two listserv inboxes. It is presently in the process of reviewing and preparing for production documents from those inboxes. Additionally, DoorDash is reviewing and preparing for production documents responsive to search terms related to the Chicago Fee for the custodians agreed-upon to date for requests relating to consumer fees. DoorDash is also in the process of preparing for production Salesforce data relating to communications from consumers, restaurants, and Dashers. DoorDash anticipates serving its privilege log on the City on March 22, 2024, the same date this joint status report will be filed.

DATED: March 22, 2024

Respectfully submitted,

**CITY OF CHICAGO DEP'T OF LAW,  
AFFIRMATIVE LITIGATION  
DIVISION**

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